



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DKK/ICR/FJN  
F. #2021R00059

271 Cadman Plaza East  
Brooklyn, New York 11201

April 13, 2021

By ECF

Jan Rostal, Esq.  
Leticia Olivera, Esq.  
Federal Defenders of New York, Inc.  
One Pierrepont Plaza - 16th Floor  
Brooklyn, NY 11201

Re:     United States v. Brendan Hunt  
Criminal Docket No. 21-086 (PKC)

Dear Counsel:

Enclosed please find the government's next production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery is being produced pursuant to the proposed protective order in this matter. The government also requests reciprocal discovery from the defendant.

| Bates Number         | Description   |
|----------------------|---|
| BH-00002654          | A certification of authenticity of business records of BitChute   |
| BH-00002655-00002657 | Documents reflecting BitChute business records and relating to the chain of custody for BitChute business records   |
| BH-00002658-00002692 | BitChute business records, consisting of comments posted by BitChute users in response to videos shared by the defendant through his BitChute video-sharing account |

Under 18 U.S.C § 3505(b), the government hereby provides written notice to the defendant that the government intends to offer into evidence at trial the records produced to the

defendant under BH-00002655-00002692, as foreign records of regularly conducted activity, pursuant to the foreign certification produced to the defendant at BH-00002654.

Very truly yours,

MARK J. LESKO  
Acting United States Attorney

By: /s/ Ian C. Richardson  
David K. Kessler  
Ian C. Richardson  
Francisco J. Navarro  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)